

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. 3:06-CR-192-N
	§	
NICK MONARREZ (31)	§	ECF

FACTUAL RESUME

ELEMENTS:

Count One

Conspiracy to Possess with the Intent to Distribute  
a Schedule II Controlled Substance  
(21 U.S.C. § 846)

- First:** That two or more persons, directly or indirectly, reached an agreement to possess with the intent to distribute and to distribute a mixture or substance containing a detectable amount of cocaine;
- Second:** That the defendant knew the unlawful purpose of the agreement; and
- Third:** That the defendant joined in the agreement wilfully, that is, with the intent to further its unlawful purpose; and
- Fourth:** That the overall scope of the conspiracy involved at least five kilograms of cocaine.

The defendant, Nick Monarrez, the defendant's attorney, Kimberly C. Priest-Johnson, and the United States of America agree that the following facts are true and correct:

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### Stipulated Facts

Beginning on May 1, 2005, and continuing through July 15, 2007, in the Dallas Division of the Northern District of Texas and elsewhere, Nick Monarrez, the defendant, and other persons both known and unknown to him, agreed to and engaged in the distribution of five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Monarrez admits and acknowledges that on multiple occasions, he received and distributed various quantities of cocaine in Dallas, Texas. For example, Monarrez admits and acknowledges that on various occasions between ~~May 1, 2005~~ and ~~July 15, 2007~~, a coconspirator supplied Monarrez with two kilogram quantities of cocaine for Monarrez to distribute to Monarrez's customers. Monarrez agrees that he paid that coconspirator \$14,600 per kilogram of cocaine. The parties agree and stipulate that the total amount of cocaine for which Monarrez is accountable during the conspiracy exceeds five kilograms <sup>→ but is less than 15 kilograms</sup> of cocaine.

Monarrez admits and acknowledges that beginning on or about ~~May 1, 2005~~ and continuing through ~~July 15, 2007~~, in the Dallas Division of the Northern District of Texas and elsewhere, he, and other coconspirators both named and not named in his indictment did, knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with each other and with other persons both known and unknown, to commit

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certain offenses against the United States, to-wit: to possess with the intent to distribute and to distribute five kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii) and 846.

AGREED TO AND SIGNED this the 16<sup>th</sup> day of November, 2012.

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

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Nick Monarrez  
Defendant

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